

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WEIFANG TENG YI JEWELRY)	
TRADING CO., LTD)	
)	
Plaintiff/Counterclaim Defendant,)	Case No. 18-cv-4651
)	
v.)	Judge John F. Kness
)	
JENS SORENSEN, et al.,)	Magistrate Judge Jeffrey Gilbert
)	
Defendants/Counterclaim Plaintiff.)	
)	

**PLAINTIFF’S MOTION FOR JUDGMENT ON THE ANSWER OF THIRD
PARTY CITATION RESPONDENT AND TURNOVER OF FUNDS**

Now Comes the Plaintiff, Weifang Tengyi Jewelry Trading Co., Ltd., by and through one of its attorneys, Charles E. McElvenny, and in support of Plaintiff’s Motion for Judgment on the Answer of Third Party Citation Respondent, PayPal Inc., and for Turnover of Funds, states as follows:

1. On February 14, 2019, judgment was entered in this Court in favor of the Plaintiff, Weifang Tengyi Jewelry Trading Co., Ltd. (Plaintiff), and against the Defendants in the total amount of \$200,000 per Defendant. See Exhibit 1 [Docket 178].

2. A Citation to Discover Assets to a Third Party was served on Third Party PayPal, Inc., on April 15, 2020. See Citation, attached hereto as Exhibit 2.

3. PayPal, Inc. served its Answer on April 20, 2020, indicating that it is in possession of non-exempt funds belonging to certain Defendants and indicating that \$3307.45 in total was being withheld. See PayPal, Inc.’s Answer, attached hereto as Exhibit 3.

4. Supplementary proceedings to enforce a judgment are governed by Federal Rule of Civil Procedure 69(a) which provides that a district court is to use state procedure governing the execution of any such judgment. Fed. R. Civ. P. 69(a).

5. Section 5/2-1402 of the Illinois Code of Civil Procedure provides that when assets of a judgment debtor not exempt from the satisfaction of a judgment are discovered, a court may enter an order or judgment compelling the person cited to deliver said assets. 735 ILCS 5/2-1402.

6. As such, the Plaintiff is entitled to the non-exempt property of Defendants identified in Exhibit 3 in partial satisfaction of the Judgment Balance remaining due.

WHEREFORE, the Plaintiff Weifang Tengyi Jewelry Trading Co., Ltd., respectfully requests that this Court enter a Judgment on its Third Party Citation and order Third Party Citation Respondent, PayPal, Inc., to turnover to Plaintiff in partial satisfaction of the judgment, the property of judgment debtors identified in Exhibit 3 in the total amount of \$3307.45, and for such other relief that this Court deems just and proper.

Respectfully Submitted:
/s/ Charles E. McElvenny
Charles E. McElvenny

Charles E. McElvenny
Law Office of Charles E. McElvenny
120 N. LaSalle Street
Suite 1200
Chicago, Illinois 60602
312-291-8330